

EXHIBIT A

State Court Documents (Summons and Complaint)

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE FIFTH JUDICIAL CIRCUIT
COUNTY OF RICHLAND)	
)	
Dennis Bedenbaugh,)	
)	SUMMONS
)	(Personal Injury)
Plaintiff,)	
v.)	
)	
Foo Fighters, Live Nation)	
Entertainment, Inc., Liberty Media)	
Corporation, Capital One Financial)	
Corp., RCA Records, Roswell)	
Records, Inc., Sony Music)	
Entertainment, The Struts, John Doe)	
1, John Doe 2, John Doe 3, and)	
John Doe 4,)	
)	
Defendants,)	
)	

TO THE DEFENDANTS ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, of which a copy is herewith served upon you, and to serve a copy of your Answer to said Complaint on the subscribed Frank A. Barton, Attorney at Law, 104 Round Knob Road, Post Office Box 2637, Lexington, South Carolina 29071, within thirty (30) days after the service hereof, exclusive of the date of such service; and if you fail to answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in the Complaint.

Lexington, South Carolina
October 15, 2020

s/Frank A. Barton SC Bar #0562
Frank A. Barton
THE BARTON LAW OFFICE
104 Round Knob Road
Post Office Box 2637
Lexington, South Carolina 29071
(803) 821-9026 / fax (803) 490-1024

JURY TRIAL DEMANDED

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE FIFTH JUDICIAL CIRCUIT
COUNTY OF RICHLAND)	
)	
Dennis Bedenbaugh,)	
)	COMPLAINT
)	(Personal Injury)
Plaintiff,)	
v.)	
)	
Foo Fighters, Live Nation)	
Entertainment, Inc., Liberty Media)	
Corporation, Capital One Financial)	
Corp., RCA Records, Roswell)	
Records, Inc., Sony Music)	
Entertainment, The Struts, John Doe)	
1, John Doe 2, John Doe 3, and)	
John Doe 4,)	
)	
Defendants,)	
)	

The Plaintiff above named, complaining of the Defendants herein, would respectfully show unto the Court:

1. The Plaintiff is a citizen and resident of the County of Lexington, State of South Carolina.
2. The Defendant Foo Fighters is an entity organized pursuant to the laws of one of the States of the United States, and does conduct business in the County of Richland, State of South Carolina.
3. The Defendant Live Nation Entertainment, Inc. is an entity organized pursuant to the laws of one of the States of the United States, and does conduct business in the County of Richland, State of South Carolina.
4. The Defendant Liberty Media Corporation is an entity organized pursuant to the laws of one of the States of the United States, and does conduct business in the County of Richland, State of South Carolina.

5. The Defendant Capital One Financial Corp. is an entity organized pursuant to the laws of one of the States of the United States, and does conduct business in the County of Richland, State of South Carolina.
6. The Defendant RCA Records is an entity organized pursuant to the laws of one of the States of the United States, and does conduct business in the County of Richland, State of South Carolina.
7. The Defendant Roswell Records, Inc. is an entity organized pursuant to the laws of one of the States of the United States, and does conduct business in the County of Richland, State of South Carolina.
8. The Defendant Sony Music Entertainment is an entity which conducts business in the County of Richland, State of South Carolina.
9. The Defendant The Struts is a band/ entity which conducts business in the County of Richland, State of South Carolina.
10. John Doe 1, John Doe 2, John Doe 3, and John Doe 4, are persons or entities whose identity is not currently known, but were conducting business activities in the County of Richland, State of South Carolina at all times relevant herein.
11. On or about October 17, 2017, all of the Defendants did jointly and individually act to conduct a musical performance and concert at the Colonial Life Arena in Columbia, South Carolina, in the County of Richland.
12. On October 17, 2017, Plaintiff was working at the Colonial Life Arena as an employee of the University of South Carolina. At that time, he was

helping move equipment onto a stage for a musical performance. He was injured when he fell from an inadequately and improperly sized lift provided by the Defendants, suffering serious injuries.

13. The injuries suffered by Plaintiff were a direct and proximate result of the negligence and recklessness of the Defendants, both jointly and severally, as follows:

- a. In providing work equipment that was unsafe for the intended use;
- b. In providing inadequately sized and small lifting platforms to lift equipment to the stage;
- c. In failing to warn Plaintiff of the danger in using inadequately sized lifting equipment;
- d. In failing to provide a safe work premises for Plaintiff to perform his work;
- e. In failing to provide adequate safety measures and warnings for the use of the equipment furnished to Plaintiff.

14. As a direct and proximate result of the negligence and recklessness of the Defendants, both jointly and severally, the Plaintiff suffered injury as follows:

- a. Suffered severe traumatic and permanent injury to his left arm, left hand, right shoulder, right arm, right clavicle, lung and other parts of his body;
- b. Incurred substantial medical expenses and will continue to incur such expenses in the future;
- c. Suffered severe pain and mental anguish and will continue to so suffer in the future;
- d. Suffered a loss of wages and impairment in his ability to earn wages in the future;

e. Suffered a loss of enjoyment of life which would continue into the future.

15. As a result of the negligence and recklessness of the Defendants, both jointly and severally, which injured the Plaintiff, the Plaintiff is informed and believes he is entitled to recover actual and punitive damages against the Defendants.

WHEREFORE, the Plaintiff prays for judgment against the Defendants, both jointly and severally, in an amount in excess of One Million (\$1,000,000.00) Dollars, actual and punitive damages, for the costs of this action, and for such other and further relief as the Court may deem just and proper.

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